



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

December 18, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Re: Lower Passaic River Study Area Draft Remedial Investigation Report –
Administrative Settlement Agreement and Order on Consent for Remedial
Investigation/Feasibility Study (Agreement) CERCLA Docket No. 02-2007-2009

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) reviewed the Cooperating Parties Group's (CPG) *draft Remedial Investigation (RI) Report Section 6*, prepared by Anchor QEA in February 2018 and provided comments on July 30, 2018. The *revised Section 6* was received from the CPG on October 01, 2018 and the CPG's responses to EPA's comments were received on October 04, 2018. EPA has reviewed the *revised Section 6* and has three remaining comment evaluations, see enclosure. Partner agencies did not provide comments on this revised section. In accordance with Section X, Paragraph 44(d) of the Agreement, EPA has enclosed an evaluation of CPG's revised RI Report with this letter.

Please proceed with revisions to the draft RI Report *Section 6* consistent with the enclosed comment evaluations. If there are any questions or clarifications needed on EPA's enclosed comment evaluations, please contact me to discuss.

Sincerely,

A handwritten signature in dark ink, appearing to read "Diane Salkie", is located below the "Sincerely," text.

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS
Enclosure

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Potter, W. (CPG)

LPRSA RI/FS, Remedial Investigation Report, Revised Draft Section 6, dated October 2018

No.	Section	General or Specific	Page No.	Comment
1	Section 6.2.1, second paragraph	Specific	7	The discussion of solids normalization in Section 6.2.1 was revised in response to prior comments #9 and #10. The discussion should qualify that "..., while solids-normalization better aligns the data with the 1:1 line <i>for some data sets</i> , considerable variability remains about this line" to reflect the variability in the comparison of volumetric and solids-normalized results presented in Figure 6-5. (<i>emphasis added to identify requested change</i>)
2	Section 6.2.2, sixth paragraph	Specific	10	In response to prior comment #2, water quality criteria were added to the Section 6.2.2 text and Figures 6-3 through 6-8. The added discussion of water quality standards notes that corresponding standards for total DDx, LMW PAHs, and HMW PAHs were not available. The text should be revised to reflect the fact that while water quality standards were not available for DDx, LMW PAHs, and HMW PAHs, criteria are available for some of the underlying constituents (e.g., 4,4-DDT and benzo(a)pyrene). In addition, the following changes should be made in the bulleted list supporting this paragraph: <ul style="list-style-type: none">Bullet 1 – change "Figure 6-4a;" to "Figures 6-4a, 6-5a, 6-6a;"Bullet 2 – change "Figures 6-4b;" to "Figures 6-4b, 6-5b, 6-6b;"
3	Section 6.3	General	16 - 20	In response to prior comment #24, a second set of points was added to Figure 6-13 to present the fine sediment fraction results from within the navigation channel separately. This second set of points shows that sediments within the navigation channel tend to be coarser grained than sediments outside the navigation channel within the LPR and that this relationship is reversed within Newark Bay. The discussion of contaminant distribution and mass presented in Section 6.3 should include a discussion of this pattern as part of the data interpretation in conjunction with the observation (page 18*) that fine-grained sediments increase within the lower reaches of the LPR.